

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-CV-6977 (GBD)(SN)

**MOTION TO VACATE AND GRANT CORRECTED ORDER OF FINAL JUDGMENT
FOR SOLATIUM DAMAGES AS TO MARION KNOX ONLY**

For the reasons set forth in the declaration of James P. Kreindler, attached hereto, the *Ashton* plaintiffs, by and through counsel, Kreindler & Kreindler LLP, respectfully move this Court to vacate its August 15, 2019 final judgment for solatium damages only as to Marion Knox (MDL ECF No. 4880 and 02-cv-6977 ECF No. 1047 at 32, line 15), and in its place, grant the proposed final order of judgment in the amount of \$8.5 million plus prejudgment interest in the amount of 4.96% to run from September 11, 2001 until the date of judgment, reflecting the total amount she should be awarded as the surviving parent of September 11, 2001 decedent Andrew Knox.

Dated: May 5, 2020
New York, NY

/s/ James P. Kreindler
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